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DOC #:
DATE FILED: 04/11/2013

Buchwald, V.

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

UNITED STATES SECURITIES
AND EXCHANGE COMMISSION,

Plaintiff,

vs.

CHINA NORTHEAST PETROLEUM HOLDINGS
LIMITED; WANG HONGJUN, (a/k/a Hongjun
Wang); JU GUIZHI (a/k/a Guizhi Ju); and JIANG
CHAO (a/k/a Chao Jiang

Defendants,

JIANG MENGFU (a/k/a Mingfu Jiang); and SUN
JISHUANG (a/k/a Jishuang Sun),

Relief Defendants.

No. 12-CV-8696 (NRB)
ECF

**STIPULATION AND ORDER
SUBSTITUTION OF
COUNSEL FOR DEFENDANT
WANG HONGJUN AND RELIEF
DEFENDANT SUN JISHUANG**

IT IS HEREBY STIPUTLATED AND AGREED, by and between the undersigned counsel and pursuant to Local Civil Rule 1.4 of the U.S. District Court for the Southern District of New York, that the law firm of Schiff Hardin LLP is hereby substituted in place and in the stead of the law firm of Cozen O'Connor as counsel of record for defendant Wang Hongjun and Relief defendant Sun Jishuang in the above-captioned action.

PLEASE TAKE NOTICE that all pleadings, notices of hearing, and other filings in this matter shall be served upon the undersigned incoming counsel at the address set forth below.

Dated: New York, New York
April 5, 2013

COZEN O'CONNOR

By: 
Jill L. Mandell


Outgoing Counsel for Defendant
Wang Hongjun and Relief
Defendant Sun Jishuang
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SCHIFF HARDIN, LLP


Geoffrey H. Coll

Incoming Counsel for Defendant
Wang Hongjun and Relief
Defendant Sun Jishuang
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New York, NY 10103
Telephone (212) 753-5000
Telefax (202) 778-6460
gcoll@schiffhardin.com

SO ORDERED


The Honorable Naomi Reice Buchwald
United States District Judge

April 10, 2013

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

UNITED STATES SECURITIES
AND EXCHANGE COMMISSION,

Plaintiff,

vs.

CHINA NORTHEAST PETROLEUM HOLDINGS
LIMITED; WANG HONGJUN, (a/k/a Hongjun
Wang); JU GUIZHI (a/k/a Guizhi Ju); and JIANG
CHAO (a/k/a Chao Jiang)

Defendants,

JIANG MENGFU (a/k/a Mingfu Jiang); and SUN
JISHUANG (a/k/a Jishuang Sun),

Relief Defendants.

No. 12-CV-8696 (NRB)
ECF

**DECLARATION OF GEOFFREY
H. COLL IN SUPPORT OF
SUBSTITUTION OF COUNSEL
FOR DEFENDANT WANG
HONGJUN AND RELIEF
DEFENDANT SUN JISHUANG**

DECLARATION OF GEOFFREY H. COLL

GEOFFREY H. COLL makes the following declaration under 28 U.S.C §1746:

1. I am a member of the law firm Schiff Hardin LLP, with its offices located at 666 Fifth Avenue, 17th Floor, New York, NY 10016, and am a member in good standing of the Bar of the State of New York, and am admitted to practice before this Court.

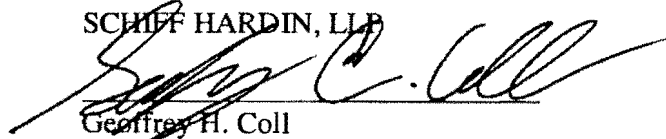
2. Pursuant to Local Civil Rule 1.4 of the Local Rules of the United States District Court for the Southern District of New York, I respectfully submit this declaration in support of the substitution of Schiff Hardin LLP for Cozen O' Connor as counsel and attorneys of record for Defendant Wang Hongjun and his wife, Relief Defendant Sun Jishuang in the above-captioned matter.

3. The reason for this substitution is that Defendant Wang Hongjun and his wife, Relief Defendant Sun Jishuang initially retained Ralph De Martino and Jill Mandel of Cozen O'Connor to represent them in the above-captioned matter. In March 2013, Mr. De Martino resigned from Cozen O'Connor and joined the Washington, DC office of Schiff Hardin LLP, and Defendant Wang Hongjun and his wife Relief Defendant Sun Jishuang have elected to retain the services of Mr. De Martino and myself of Schiff Hardin LLP to represent them in the above-captioned matter going forward.

4. The Complaint in this matter was filed on November 29, 2012. Three stipulations so ordered by this Court extending the time to respond to the Complaint have already been obtained. Under the most recent stipulation so ordered by this Court, initial responsive pleadings to the Complaint are currently due on this Friday, April 12, 2013.

Dated: New York, New York
April 8, 2013

SCHIFF HARDIN, LLP



Geoffrey H. Coll

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Wang Hongjun and Relief
Defendant Sun Jishuang
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